

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STEPHANIE ROSS,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA, a foreign
corporation,

Defendant.

Case No. 2:17-cv-00312-JLR

**UNOPPOSED MOTION AND
PROPOSED ORDER FOR
EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

NOTE ON MOTION CALENDAR:
March 27, 2017

Defendant, The Prudential Insurance Company of America ("Prudential"), by and through its attorneys, moves this Court for an Order extending the time for Prudential to answer or otherwise respond to the Complaint. The answer is currently due March 29, 2017. Plaintiff, Stephanie Ross, does not oppose this motion. Defendant respectfully requests an extension of time to answer or otherwise respond of 14 days until April 12, 2017.

In support of its unopposed motion, Prudential states as follows:

1. On February 28, 2017, Plaintiff filed this action in the U.S. District Court for the Western District of Washington, and Prudential was served on March 8, 2017 through the Washington Insurance Commissioner.

2. Prudential began promptly collecting and reviewing the relevant file documents in order to prepare a response to Plaintiff's Complaint, but requests additional time of 14 days to complete its investigation and prepare its response.

UNOPPOSED MOTION AND PROPOSED ORDER FOR EXTENSION
OF TIME TO RESPOND TO THE COMPLAINT

(Case No. 2:17-cv-00312-JLR) - 1

119219.0017/6911248.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

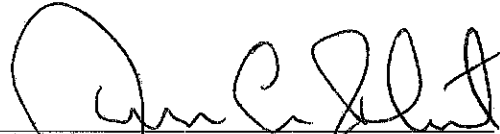
LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

PLR

~~PROPOSED~~ ORDER

IT IS SO ORDERED. The deadline for Prudential to answer or otherwise respond to the plaintiff's complaint is extended until April 12, 2017.

DATED this 28th day of March, 2017.


The Honorable James L. Robart
United States District Court Judge

UNOPPOSED MOTION AND PROPOSED ORDER FOR EXTENSION
OF TIME TO RESPOND TO THE COMPLAINT

(Case No. 2:17-cv-00312-JLR) - 3

119219.0017/6911248.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

CERTIFICATE OF SERVICE

Pursuant to RCW 9A.72.085, the undersigned certifies under penalty of perjury under the laws of the State of Washington and the United States, that on the 27th day of March, 2017, the document attached hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

Attorneys for Plaintiff:

Patrick. H. LePley
LePLEY LAW FIRM
12600 SE 38th Street, Suite 201
Bellevue, WA 98006
Email: phl@pleylawfirm.com

Joseph S. McMillen, *Pro Hac Vice*
Robert John McKennon, *Pro Hac Vice*
MCKENNON LAW GROUP PC
20321 SW Birch St.
Suite 200
Newport Beach, CA 92660
Email: jm@mckennonlawgroup.com
Email: rm@mckennonlawgroup.com

Executed on the 27th day of March, 2017, at Seattle, Washington.

s/ Lou Rosenkranz

Lou Rosenkranz, Legal Assistant

UNOPPOSED MOTION AND PROPOSED ORDER FOR EXTENSION
OF TIME TO RESPOND TO THE COMPLAINT

(Case No. 2:17-cv-00312-JLR) - 4

119219.0017/6911248.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107